

Minor Modification Summary of Changes

Vantage Specialties
I.D. No.: 097035AAQ
Permit No.: 96030159

Minor Modification Application Received: October 16, 2015

Administrative Changes

The associated Administrative Changes with this Minor Modification request are:

1. Changed the name and title of responsible officials and source contacts, this includes their contact information.
2. Corrected typographical errors in Condition 4.6.2(C) (ii) (A).

Pursuant to Section 39.5(13)(c) of the Act, the above changes qualify as administrative permit amendments since they:

- A) correct typographical errors;
- B) identify a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- C) require more frequent monitoring or reporting by the permittee; or
- D) allow for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittees has been submitted to the Illinois EPA.

Minor Permit Modifications

1. Incorporation of Construction Permits #'s 15110023, and 15110027 into this CAAPP Permit. Permit #15110023 adds a new thermal oil heater B3, and replaces an existing unit. Permit #15110027 makes changes to the alkoxylation area of facility, adds Reactor R-6, Finishing Vessel r42 with Condenser R42_HX1. The Permit also increases throughput of Finishing tanks R30-34. Permit 15110027 also establishes new emissions limits for multiple units.
2. Revision of Table in Section 4.2, Incorporation of Construction Permit #15110023. Addition of newly constructed Boiler B3.
3. Revision of Condition 4.2.2(c) (i), NOX limits superseded by construction permit #15110027, information moved to section 5.1 of this CAAPP permit.
4. Revision of Condition 4.2.2(d) (i) (B), heat input of Boiler B3 applied to permit.
5. Revision of Condition 4.2.2(d) (ii) (B) and (C), addition of Title 1 recordkeeping requirements for Boilers.
6. Revision of Condition 4.2.2(e) (i) (A), addition of basis of work practice requirement.
7. Addition of Condition 4.2.2(e) (ii) (C) and (D), incorporation of Title 1 requirements into CAAPP permit.
8. Elimination of Condition 4.2.3(c), Boiler is a steam generating unit according to 40 CFR 60 Subpart Dc.
9. Revision of table in Condition 4.3.1, elimination of nonexistent Reactor and addition of emission units from Construction Permit 15110027.
10. Revision of Condition 4.3.1(a) (i) (B), addition of exempt emission units that apply to 35 IAC 218 Subpart RR.
11. Revision of Condition 4.3.1(a) (ii) (a) and (B), expansion of Pursuant to language by adding Construction Permit 15110027.

12. Revision of Condition 4.3(a)(ii)(E), testing requirements have changed for VOM emissions according to construction permit #15110027.
13. Revision of Condition 4.3(a)(ii)(G)(II), incorporation of new operating parameters found in 15110027.
14. Revision of Condition 4.3(a)(ii)(H)-(L), addition of language making conditions pursuant to both Construction permits 15110023, and 15110027.
15. Addition of Conditions Condition 4.3(a)(ii)(M)-(O), incorporation of title 1 in CAAPP. These conditions pertain to VOM recordkeeping requirements.
16. Addition of Conditions Condition 4.3(b)(i), incorporation of construction permit 15110027 work practice requirements.
17. Addition of Condition 4.3.3(e), non-applicable determination for emission units listed in Condition 4.3.2(a)(i)(B).
18. Addition of Condition 4.3.5(b)(i), state reporting requirement for 35 IAC 218 Subpart RR.
19. Addition of Condition 4.6.2(d)(i) through (ii), incorporation of requirements found in construction permit 15110027. Federal regulation requirements added for components subject to 40 CFR 60 Subpart VVa.
20. Revision of Condition 4.6.3(a), changed language for non-applicable emission units.
21. Addition of Condition 4.6.5(c), incorporation of semiannual federal reporting requirements.
22. Revision of Condition 5.1(a)(i)-(iii), incorporation of Construction Permit 15110027, changed emission limits, and compliance requirements.
23. Revision of Condition 5.1(b)(i)-(iii), incorporation of Construction permit 15110027, changed emission units, emission limits, operational requirements, and compliance requirements.
24. Addition of Section 6.1, incorporation of RICE requirements of 40 CFR 63 Subpart ZZZZ.
25. Revision of Condition 6.2, unit quantities adjusted for holding tanks and addition of Barometric contact cooling tower to section from construction permit number 15110027.
26. Revision of Section 8, adjustment of permitted emission for fees to coincide with actual emissions.

Pursuant to Section 39.5(14)(a) of the Act, the above permit modifications qualify as a minor modification because the changes do not:

- A) violate any applicable requirement;
- B) involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- C) require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- D) seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject;
- E) trigger a modification under any provision of Title I of the Clean Air Act; and
- F) trigger processing as a significant modification.